

## **EXHIBIT “B”**

1 **Form Interrogatory No. 4.1:**

2 At the time of the INCIDENT, was there in effect any policy of insurance through which  
3 you were or might be insured in any manner (for example, primary, pro-rata, or excess liability  
4 coverage or medical expense coverage) for the damages, claims, or actions that have arisen out of  
5 the INCIDENT? If so, for each policy state: (a) the kind of coverage; (b) the name and  
6 ADDRESS of the insurance company; (c) the name, ADDRESS, and telephone number of each  
7 named insured; (d) the policy number; (e) the limits of coverage for each type of coverage  
8 contained in the policy; (f) whether any reservation of rights or controversy or coverage dispute  
9 exists between you and the insurance company; and (g) the name, ADDRESS, and telephone  
10 number of the custodian of the policy.

11 **Response to Form Interrogatory No. 4.1:**

12 Defendant has a \$250,000 SIR. Beyond that, there is an excess layer of insurance through  
13 The National Catholic Risk Retention Group of \$750,000 over the SIR. Beyond that there is  
14 another excess policy with The National Catholic Risk Retention Group of \$14,000,000 over the  
15 \$1,000,000.

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